

Exhibit 2

From: Cross, David D. <DCross@mofo.com>
Sent: Thursday, August 27, 2020 8:29 PM
To: Carey Miller; Josh Belinfante
Cc: Robert McGuire; Bruce Brown; Jonathan Crumly; Conaway, Jenna B.; Miriyala, Arvind S.; cichter@ichterdavis.com; Hedgecock, Lyle F.; Bryan Tyson; Vincent Russo; Alexander Denton; kaye.burwell@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; david.lowman@fultoncountyga.gov
Subject: RE: State Defendants' Expedited Document Production

Carey -

You guys unilaterally filed a discovery motion less than one business day after serving document requests without a meet and confer, and insisted that was proper. We've asked only for an email that provides the information needed to evaluate the privilege claim for a document you asserted privilege over yesterday. Tomorrow will be two business days after the assertion and after we requested the required disclosure. With respect, either you provide the required information by tomorrow morning and we confer tomorrow morning, or we'll alert the court that you declined to do so and proceed with an appropriate filing. There's no reason to delay this further. Please let us know how you'd like to proceed.

Thanks.
DC

From: Carey Miller <carey.miller@robbinsfirm.com>
Date: Thursday, Aug 27, 2020, 8:23 PM
To: Cross, David D. <DCross@mofo.com>, Josh Belinfante <Josh.Belinfante@robbinsfirm.com>
Cc: Robert McGuire <ram@lawram.com>, Bruce Brown <bbrown@brucebrownlaw.com>, Jonathan Crumly <jcrumly@taylorenghish.com>, Conaway, Jenna B. <JConaway@mofo.com>, Miriyala, Arvind S. <AMiriyala@mofo.com>, cichter@ichterdavis.com <cichter@ichterdavis.com>, Hedgecock, Lyle F. <LHedgecock@mofo.com>, Bryan Tyson <btyson@taylorenghish.com>, Vincent Russo <vrusso@robbinsfirm.com>, Alexander Denton <Alexander.Denton@robbinsfirm.com>, kaye.burwell@fultoncountyga.gov <kaye.burwell@fultoncountyga.gov>, cheryl.ringer@fultoncountyga.gov <cheryl.ringer@fultoncountyga.gov>, david.lowman@fultoncountyga.gov <david.lowman@fultoncountyga.gov>
Subject: RE: State Defendants' Expedited Document Production

External Email

David,

While I'm not sure Rule 26 provides for the detail your bullet points insist, we will provide a formal privilege log after the completion of our expedited review and production. I would suggest any conference occur after that point. As for tomorrow morning, you may recall we owe your co-plaintiffs a production and the Court a response to Coalition's second motion for preliminary injunction. In light of Robert's email to the Court this morning which, at best, misrepresented some central facts, we will be focusing on getting your expedited discovery to you and responding to Coalition's brief tomorrow, in a hope to avoid an unnecessary repetition of this morning.

In the meantime, I don't recall seeing a response to Bryan's email regarding the joint discovery statement you all demanded we complete with about four hours' notice. Do you intend to move forward on that issue? If not, we would appreciate no longer imposing unreasonable artificial deadlines on each other.

Please also note, I have removed Marilyn from this email.

Carey A. Miller | 404.856.3286 | [ROBBINS](#)

From: Cross, David D. [mailto:DCross@mofo.com]

Sent: Thursday, August 27, 2020 8:10 PM

To: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>

Cc: Carey Miller <carey.miller@robbinsfirm.com>; Robert McGuire <ram@lawram.com>; Bruce Brown <bbrown@brucepbrownlaw.com>; Jonathan Crumly <jcrumly@taylorenghish.com>; Conaway, Jenna B. <JConaway@mofo.com>; Miriyala, Arvind S. <AMiriyala@mofo.com>; cichter@ichterdavis.com; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; Vincent Russo <vrusso@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; kaye.burwell@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; david.lowman@fultoncountyga.gov; Marilyn Marks <Marilyn@uscgg.org>

Subject: RE: State Defendants' Expedited Document Production

Sure. We need at least the following information to evaluate the claim:

- author of the document (not just the company)
- date it was created
- each recipient of the document: name, employer, and title
- date each recipient received it
- the litigation for which it was prepared
- description of the substance of the document
- explanation of how it constitutes work product given it was prepared by a third-party consultant whose prior reports already have been produced as non-privileged

Thanks.

DC

From: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>

Date: Thursday, Aug 27, 2020, 8:04 PM

To: Cross, David D. <DCross@mofo.com>

Cc: Carey Miller <carey.miller@robbinsfirm.com>, Robert McGuire <ram@lawram.com>, Bruce Brown <bbrown@brucepbrownlaw.com>, Jonathan Crumly <jcrumly@taylorenghish.com>, Conaway, Jenna B. <JConaway@mofo.com>, Miriyala, Arvind S. <AMiriyala@mofo.com>, cichter@ichterdavis.com <cichter@ichterdavis.com>, Hedgecock, Lyle F. <LHedgecock@mofo.com>, Bryan Tyson <btyson@taylorenghish.com>, Vincent Russo <vrusso@robbinsfirm.com>, Alexander Denton <Alexander.Denton@robbinsfirm.com>, kaye.burwell@fultoncountyga.gov <kaye.burwell@fultoncountyga.gov>, cheryl.ringer@fultoncountyga.gov <cheryl.ringer@fultoncountyga.gov>, david.lowman@fultoncountyga.gov <david.lowman@fultoncountyga.gov>, Marilyn Marks <Marilyn@uscgg.org>

Subject: Re: State Defendants' Expedited Document Production

David:

So we can have a productive conversation, can you shed a little more light on your statement that Carey's email does not comply with the Federal Rule?

Thanks,
JB

Sent from my iPhone

On Aug 27, 2020, at 7:59 PM, Cross, David D. <DCross@mofo.com> wrote:

Carey -

Please provide a time to meet and confer tomorrow morning re this issue. Your email doesn't comply with R26 and we intend to seek in camera review if we don't receive an appropriate explanation of the privilege assertion by the morning.

Thanks.
DC

From: Carey Miller <carey.miller@robbinsfirm.com>
Date: Thursday, Aug 27, 2020, 6:45 PM
To: Cross, David D. <DCross@mofo.com>, Robert McGuire <ram@lawram.com>, Bruce Brown <bbrown@brucepbrownlaw.com>
Cc: Jonathan Crumly <jcrumly@taylorenghish.com>, Conaway, Jenna B. <JConaway@mofo.com>, Miriyala, Arvind S. <AMiriyala@mofo.com>, cichter@ichterdavis.com <cichter@ichterdavis.com>, Hedgecock, Lyle F. <LHedgecock@mofo.com>, Bryan Tyson <btyson@taylorenghish.com>, Josh Belinfante <Josh.Belinfante@robbinsfirm.com>, Vincent Russo <vrusso@robbinsfirm.com>, Alexander Denton <Alexander.Denton@robbinsfirm.com>, kaye.burwell@fultoncountyga.gov <kaye.burwell@fultoncountyga.gov>, cheryl.ringer@fultoncountyga.gov <cheryl.ringer@fultoncountyga.gov>, david.lowman@fultoncountyga.gov <david.lowman@fultoncountyga.gov>, Marilyn Marks <Marilyn@USCGG.org>
Subject: RE: State Defendants' Expedited Document Production

External Email

David,

Apologies as a lot of email traffic here. The communication being withheld is a report concerning BMDs created by Fortalice and undertaken in preparation for active litigation at the direction of Ryan Germany, the General Counsel for the SOS. Mr. Germany was operating under the instruction of this law firm and the Taylor English law firm in our capacities as counsel for the State Defendants. The document is protected by the attorney work product doctrine.

Have a good evening.

Carey A. Miller | 404.856.3286 |

<image001.jpg>

From: Cross, David D. [<mailto:DCross@mofo.com>]
Sent: Thursday, August 27, 2020 4:26 PM
To: Carey Miller <carey.miller@robbinsfirm.com>; Robert McGuire <ram@lawram.com>; Bruce Brown <bbrown@brucepbrownlaw.com>
Cc: Jonathan Crumly <jcrumly@taylorenghish.com>; Conaway, Jenna B. <JConaway@mofo.com>; Miriyala, Arvind S. <AMiriyala@mofo.com>; cichter@ichterdavis.com; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Vincent Russo <vrusso@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; kaye.burwell@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; david.lowman@fultoncountyga.gov; Marilyn Marks <Marilyn@USCGG.org>
Subject: RE: State Defendants' Expedited Document Production

I didn't see a response to my email about the document withheld as privileged. Sorry if I missed it. When are we getting the information required under R26? Did you provide that yet? I've not seen it.

From: Carey Miller <carey.miller@robbinsfirm.com>
Date: Thursday, Aug 27, 2020, 2:50 PM
To: Robert McGuire <ram@lawram.com>, Cross, David D. <DCross@mofo.com>, Bruce Brown <bbrown@brucepbrownlaw.com>
Cc: Jonathan Crumly <jcrumly@taylorenghish.com>, Conaway, Jenna B. <JConaway@mofo.com>, Miriyala, Arvind S. <AMiriyala@mofo.com>, cichter@ichterdavis.com <cichter@ichterdavis.com>, Hedgecock, Lyle F. <LHedgecock@mofo.com>, Bryan Tyson <btyson@taylorenghish.com>, Josh Belinfante <Josh.Belinfante@robbinsfirm.com>, Vincent Russo <vrusso@robbinsfirm.com>, Alexander Denton <Alexander.Denton@robbinsfirm.com>, kaye.burwell@fultoncountyga.gov <kaye.burwell@fultoncountyga.gov>, cheryl.ringer@fultoncountyga.gov <cheryl.ringer@fultoncountyga.gov>, david.lowman@fultoncountyga.gov <david.lowman@fultoncountyga.gov>, Marilyn Marks <Marilyn@USCGG.org>
Subject: RE: State Defendants' Expedited Document Production

External Email

Yes, Rob there are only two productions. I was a bit confused by your email to the Court on that front.

Carey A. Miller | 404.856.3286 |
<image001.jpg>

From: Robert McGuire [<mailto:ram@lawram.com>]
Sent: Thursday, August 27, 2020 2:50 PM
To: Carey Miller <carey.miller@robbinsfirm.com>; Cross, David D. <DCross@mofo.com>; Bruce Brown <bbrown@brucepbrownlaw.com>
Cc: Jonathan Crumly <jcrumly@taylorenghish.com>; Conaway, Jenna B. <JConaway@mofo.com>;

Miriyala, Arvind S. <AMiriyala@mofo.com>; cichter@ichterdavis.com; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Vincent Russo <vrusso@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; kaye.burwell@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; david.lowman@fultoncountyga.gov; Marilyn Marks <Marilyn@USCGG.org>

Subject: RE: State Defendants' Expedited Document Production

From External Sender

Carey,

So we can ensure we are aware of everything the State Defendants have produced in response to both Plaintiffs' groups' expedited discovery requests, can you please confirm there are two productions only – 006 and 007?

Is there anything else?

Thanks.

Best,
Robert McGuire

ROBERT A. MCGUIRE, III

*** NOTE NEW CONTACT DETAILS BELOW ***

SHAREHOLDER | THE ROBERT MCGUIRE LAW FIRM

1624 MARKET ST STE 226 #86685, DENVER, CO 80202-2523 | 113 CHERRY ST #86685, SEATTLE, WA 98104-2205

E: ram@lawram.com | T/F: 720.420.1395 | T/F: 253.267.8530 | www.lawram.com

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From: Carey Miller <carey.miller@robbinsfirm.com>

Sent: Thursday, August 27, 2020 9:49 AM

To: Robert McGuire <ram@lawram.com>; Cross, David D. <DCross@mofo.com>; Bruce Brown <bbrown@brucebrownlaw.com>

Cc: Jonathan Crumly <jcrumly@taylorenghish.com>; Conaway, Jenna B. <JConaway@mofo.com>; Miriyala, Arvind S. <AMiriyala@mofo.com>; cichter@ichterdavis.com; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Vincent Russo <vrusso@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; kaye.burwell@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; david.lowman@fultoncountyga.gov

Subject: RE: State Defendants' Expedited Document Production

Robert, I apparently misspoke as the 007 production was .38 gb on just the image files. The total production size for 007 (images, extracted text, natives and load files) is 2.2 GB Unzipped, 1.9 GB zipped (there are a handful of video files in here which inflate the size); 006 is 3.37 GB Unzipped, 2.59 GB zipped.

Link for 007 is below, you will need to use carey.miller@robbinsfirm.com as the email to log in:

Follow the link below to download your transport data.

Your password: 2dALdh;^FpKx

Your password will expire on: 10/31/2020

Download link:

<https://rellswp.istmanagement.com?JHkV4kJwO8NVvJy6i0FdtwJOqP%2bIKvYR060aVmsYKtr7aGQppil8LcejycWkZSA%2fQs7c%2bGZy5mc%3d>

Carey A. Miller | 404.856.3286 |

<image001.jpg>

From: Robert McGuire [<mailto:ram@lawram.com>]

Sent: Thursday, August 27, 2020 12:31 PM

To: Carey Miller <carey.miller@robbinsfirm.com>; Cross, David D. <DCross@mofo.com>; Bruce Brown <bbrown@brucepbrownlaw.com>

Cc: Jonathan Crumly <jcrumly@taylorenghish.com>; Conaway, Jenna B. <JConaway@mofo.com>; Miriyala, Arvind S. <AMiriyala@mofo.com>; cichter@ichterdavis.com; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Vincent Russo <vrusso@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; kaye.burwell@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; david.lowman@fultoncountyga.gov

Subject: RE: State Defendants' Expedited Document Production

From External Sender

Carey, please send us (Coalition Plaintiffs) this smaller link as well. Thank you.

Best,

Robert McGuire

ROBERT A. MCGUIRE, III

SHAREHOLDER | THE ROBERT MCGUIRE LAW FIRM

1624 MARKET ST STE 226 #86685, DENVER, CO 80202-2523 | 113 CHERRY ST #86685, SEATTLE, WA 98104-2205

E: ram@lawram.com | T/F: 720.420.1395 | T/F: 253.267.8530 | www.lawram.com

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From: Carey Miller <carey.miller@robbinsfirm.com>

Sent: Thursday, August 27, 2020 8:53 AM

To: Cross, David D. <DCross@mofo.com>; Bruce Brown <bbrown@brucepbrownlaw.com>

Cc: Jonathan Crumly <jcrumly@taylorenghish.com>; Conaway, Jenna B. <JConaway@mofo.com>; Miriyala, Arvind S. <AMiriyala@mofo.com>; Robert McGuire <ram@lawram.com>; cichter@ichterdavis.com; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Vincent Russo <vrusso@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; kaye.burwell@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov;

david.lowman@fultoncountyga.gov

Subject: RE: State Defendants' Expedited Document Production

David,

The supplemental production we previously discussed is processing now. It is far smaller (.38 gb instead of 3.37; 89 files). Our vendor is loading this into your MoFo sharefile link now.

Carey A. Miller | 404.856.3286 |
<image001.jpg>

From: Carey Miller

Sent: Thursday, August 27, 2020 9:46 AM

To: Cross, David D. <DCross@mofo.com>; Bruce Brown <bbrown@brucepbrownlaw.com>

Cc: Jonathan Crumly <jcrumly@taylorenghish.com>; Conaway, Jenna B. <JConaway@mofo.com>; Miriyala, Arvind S. <AMiriyala@mofo.com>; ram@lawram.com; cichter@ichterdavis.com; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; Josh Belinfante <Josh.Belinfante@robbsfirm.com>; Vincent Russo <vrusso@robbsfirm.com>; Alexander Denton <Alexander.Denton@robbsfirm.com>; kaye.burwell@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; david.lowman@fultoncountyga.gov

Subject: RE: State Defendants' Expedited Document Production

David,

As you know, we provided the dropbox link at 10:14 last night. It was not until 11:45 that I was informed there was any issue, and 12:33 am when the issue was actually explained. Similarly, your suggested fixes were also provided in the wee hours of this morning after (sending your file share link at 1:13 and suggesting we zip and reupload the documents, which again would take hours, at 12:33). Bizarrely, the requests were made directly to me with no other counsel copied. As you might suspect, at that point myself, our vendor, and the rest of our team had called it a night. And with any alternative, the upload time for the files is not instant. To be clear, this is a large production and all of the files are in the link provided, they are also already split into seven individual folders.

I'm sorry that you guys are having difficulty downloading the files, and perhaps downloading the split folders individually would solve the issue. Our e-discovery vendor is uploading the production into your MoFo share file (again, due to the size, this will take some time but I'm sure you can see on your end that it is in progress) and we will also provide an additional link to our vendor portal for you to access the documents that way. Additionally, if you wish I'm sure we can provide the production by hard drive to Bruce here locally.

If you feel you need to go to the Court due to lost time reviewing documents between 12:30 am last night and this morning, that is your prerogative.

Carey A. Miller | 404.856.3286 |
<image001.jpg>

From: Cross, David D. [<mailto:DCross@mofo.com>]

Sent: Thursday, August 27, 2020 9:16 AM

To: Carey Miller <carey.miller@robbsfirm.com>; Bruce Brown <bbrown@brucepbrownlaw.com>

Cc: Jonathan Crumly <jcrumly@taylorenghish.com>; Conaway, Jenna B. <JConaway@mofo.com>;

Miriyala, Arvind S. <AMiriyala@mofo.com>; ram@lawram.com; cichter@ichterdavis.com; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Vincent Russo <vrusso@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; kaye.burwell@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; david.lowman@fultoncountyga.gov
Subject: RE: State Defendants' Expedited Document Production

From External Sender

Carey - We still can't download the production. We've now lost a lot of time to review what looks to be tens of thousands of documents. And nobody has responded to our emails. At this point we'll need to alert the court that more time likely will be needed for our replies. Respectfully, that will have to come out of your sur-reply time since we're not responsible for the delay, unless the court can push back your sur-reply. In any event, please fix this immediately. We provided last night a simple means of getting us the documents. You need only upload them with the link we provided.

DC

From: Cross, David D. <DCross@mofo.com>
Date: Thursday, Aug 27, 2020, 12:19 AM
To: Carey Miller <carey.miller@robbinsfirm.com>, Bruce Brown <bbrown@brucepbrownlaw.com>
Cc: Jonathan Crumly <jcrumly@taylorenghish.com>, Conaway, Jenna B. <JConaway@mofo.com>, Miriyala, Arvind S. <AMiriyala@mofo.com>, ram@lawram.com <ram@lawram.com>, cichter@ichterdavis.com <cichter@ichterdavis.com>, Hedgecock, Lyle F. <LHedgecock@mofo.com>, Bryan Tyson <btyson@taylorenghish.com>, Josh Belinfante <Josh.Belinfante@robbinsfirm.com>, Vincent Russo <vrusso@robbinsfirm.com>, Alexander Denton <Alexander.Denton@robbinsfirm.com>, kaye.burwell@fultoncountyga.gov <kaye.burwell@fultoncountyga.gov>, cheryl.ringer@fultoncountyga.gov <cheryl.ringer@fultoncountyga.gov>, david.lowman@fultoncountyga.gov <david.lowman@fultoncountyga.gov>
Subject: RE: State Defendants' Expedited Document Production

Where's the declaration you filed under seal? We don't seem to have that. You're not submitting that only for the Court to review ex parte, are you?

From: Carey Miller <carey.miller@robbinsfirm.com>
Sent: Wednesday, August 26, 2020 9:57 PM
To: Bruce Brown <bbrown@brucepbrownlaw.com>
Cc: Cross, David D. <DCross@mofo.com>; Jonathan Crumly <jcrumly@taylorenghish.com>; Conaway, Jenna B. <JConaway@mofo.com>; Miriyala, Arvind S. <AMiriyala@mofo.com>; ram@lawram.com; cichter@ichterdavis.com; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Vincent Russo <vrusso@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; kaye.burwell@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; david.lowman@fultoncountyga.gov
Subject: RE: State Defendants' Expedited Document Production

External Email

Thanks, Bruce.

Carey A. Miller | 404.856.3286 |
<image001.jpg>

From: Bruce Brown [<mailto:bbrown@brucebrownlaw.com>]
Sent: Wednesday, August 26, 2020 9:56 PM
To: Carey Miller <carey.miller@robbinsfirm.com>
Cc: Cross, David D. <DCross@mofo.com>; Jonathan Crumly <jcrumly@taylorenghish.com>; Conaway, Jenna B. <JConaway@mofo.com>; Miriyala, Arvind S. <AMiriyala@mofo.com>; ram@lawram.com; cichter@ichterdavis.com; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Vincent Russo <vrusso@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; kaye.burwell@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; david.lowman@fultoncountyga.gov
Subject: Re: State Defendants' Expedited Document Production

From External Sender

Carey - that's fine on bullet two.

On Aug 26, 2020, at 9:01 PM, Carey Miller <carey.miller@robbinsfirm.com> wrote:

Thanks David, and I'm not sure if the September 4 Amended Initial Disclosures item re joint discovery report was answered earlier, but that date is fine on our end.

Carey A. Miller | 404.856.3286 |
<image001.jpg>

From: Cross, David D. [<mailto:DCross@mofo.com>]
Sent: Wednesday, August 26, 2020 8:39 PM
To: Jonathan Crumly <jcrumly@taylorenghish.com>
Cc: Carey Miller <carey.miller@robbinsfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>; Miriyala, Arvind S. <AMiriyala@mofo.com>; Bruce Brown <bbrown@brucebrownlaw.com>; ram@lawram.com; cichter@ichterdavis.com; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Vincent Russo <vrusso@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; kaye.burwell@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; david.lowman@fultoncountyga.gov
Subject: RE: State Defendants' Expedited Document Production

Yes. Sorry. I can't speak to the second bullet though as that's not directed at my clients. I understand Bruce is tied up for a while this evening - FYI.

From: Jonathan Crumly <jcrumly@taylorenghish.com>
Date: Wednesday, Aug 26, 2020, 8:37 PM
To: Cross, David D. <DCross@mofo.com>
Cc: Carey Miller <carey.miller@robbinsfirm.com>, Conaway, Jenna B. <JConaway@mofo.com>, Miriyala, Arvind S. <AMiriyala@mofo.com>, Bruce Brown <bbrown@brucepbrownlaw.com>, ram@lawram.com <ram@lawram.com>, cichter@ichterdavis.com <cichter@ichterdavis.com>, Hedgecock, Lyle F. <LHedgecock@mofo.com>, Bryan Tyson <btyson@taylorenghish.com>, Josh Belinfante <Josh.Belinfante@robbinsfirm.com>, Vincent Russo <vrusso@robbinsfirm.com>, Alexander Denton <Alexander.Denton@robbinsfirm.com>, kaye.burwell@fultoncountyga.gov <kaye.burwell@fultoncountyga.gov>, cheryl.ringer@fultoncountyga.gov <cheryl.ringer@fultoncountyga.gov>, david.lowman@fultoncountyga.gov <david.lowman@fultoncountyga.gov>
Subject: Re: State Defendants' Expedited Document Production

So is that consent to the requested extension?

Jonathan Crumly
Taylor English Duma LLP | [1600 Parkwood Circle, Suite 200, Atlanta, GA 30339](https://www.taylorenghish.com)
P: [678.426.4659](tel:678.426.4659) | M: [770.883.6344](tel:770.883.6344) | jcrumly@taylorenghish.com
www.taylorenghish.com

Sent from my iPad

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On Aug 26, 2020, at 8:30 PM, Cross, David D. <DCross@mofo.com> wrote:

Ok. Thanks.

From: Carey Miller <carey.miller@robbinsfirm.com>
Date: Wednesday, Aug 26, 2020, 8:28 PM
To: Cross, David D. <DCross@mofo.com>, Conaway, Jenna B. <JConaway@mofo.com>, Miriyala, Arvind S. <AMiriyala@mofo.com>, 'Bruce Brown' <bbrown@brucepbrownlaw.com>, 'ram@lawram.com' <ram@lawram.com>, 'cichter@ichterdavis.com' <cichter@ichterdavis.com>, Hedgecock, Lyle F. <LHedgecock@mofo.com>

Cc: Bryan Tyson <btyson@taylorenghish.com>, Josh Belinfante <Josh.Belinfante@robbinsfirm.com>, Vincent Russo <vrusso@robbinsfirm.com>, Alexander Denton <Alexander.Denton@robbinsfirm.com>, Jonathan Crumly <jcrumly@taylorenghish.com>, 'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>, 'cheryl.ringer@fultoncountyga.gov' <cheryl.ringer@fultoncountyga.gov>, 'david.lowman@fultoncountyga.gov' <david.lowman@fultoncountyga.gov>

Subject: RE: State Defendants' Expedited Document Production

External Email

I don't think there will be any issue getting them out the door to you by noon. The time comes into play more for the processing/stamping and then uploading of documents to dropbox, but few enough documents that I don't think it would be that slow.

Carey A. Miller | 404.856.3286 |
<image002.jpg>

From: Cross, David D. [<mailto:DCross@mofo.com>]
Sent: Wednesday, August 26, 2020 8:23 PM
To: Carey Miller <carey.miller@robbinsfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>; Miriyala, Arvind S. <AMiriyala@mofo.com>; 'Bruce Brown' <bbrown@brucepbrownlaw.com>; 'ram@lawram.com' <ram@lawram.com>; 'cichter@ichterdavis.com' <cichter@ichterdavis.com>; Hedgecock, Lyle F. <LHedgecock@mofo.com>
Cc: Bryan Tyson <btyson@taylorenghish.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Vincent Russo <vrusso@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; Jonathan Crumly <jcrumly@taylorenghish.com>; 'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>; 'cheryl.ringer@fultoncountyga.gov' <cheryl.ringer@fultoncountyga.gov>; 'david.lowman@fultoncountyga.gov' <david.lowman@fultoncountyga.gov>
Subject: RE: State Defendants' Expedited Document Production

To the first bullet, do you have an estimated time tomorrow? If it's the morning, that's fine with me. Is that what you have in mind?

From: Carey Miller <carey.miller@robbinsfirm.com>
Date: Wednesday, Aug 26, 2020, 8:00 PM

To: Cross, David D. <DCross@mofo.com>, Conaway, Jenna B. <JConaway@mofo.com>, Miriyala, Arvind S. <AMiriyala@mofo.com>, 'Bruce Brown' <bbrown@brucepbrownlaw.com>, 'ram@lawram.com' <ram@lawram.com>, 'cichter@ichterdavis.com' <cichter@ichterdavis.com>, Hedgecock, Lyle F. <LHedgecock@mofo.com>
Cc: Bryan Tyson <btyson@taylorenghish.com>, Josh Belinfante <Josh.Belinfante@robbsfirm.com>, Vincent Russo <vrusso@robbsfirm.com>, Alexander Denton <Alexander.Denton@robbsfirm.com>, Jonathan Crumly <jcrumly@taylorenghish.com>, 'kaye.burwell@fultoncountyyga.gov' <kaye.burwell@fultoncountyyga.gov>, 'cheryl.ringer@fultoncountyyga.gov' <cheryl.ringer@fultoncountyyga.gov>, 'david.lowman@fultoncountyyga.gov' <david.lowman@fultoncountyyga.gov>
Subject: State Defendants' Expedited Document Production

External Email

Counsel,

State Defendants are preparing documents for production this evening which are in the process of uploading to an ftp to send to you all. However, we have run into a handful of issues relating to two categories of documents and wanted to request your consent to a short extension prior to raising the issue with the Court.

- Plaintiffs' Joint Request Number 12: State Defendants will be producing documents to you this evening which are responsive to this request. However, we ran into a technical issue when uploading some documents which may be responsive to this request into our e-discovery platform and thus inadvertently missed them for review. The documents at issue amount to less than 2% of the total number of documents we will produce this evening and we intend to produce those documents to you **tomorrow, August 27, 2020.**
- Coalition Plaintiffs' Request Number 2(b)(i): This request seeks communications with three (3) specific counties regarding "vote mark threshold settings." As we have discussed, the Secretary's Office has diverted staff from their work certifying election results and preparing for recounts, the September Special Election in CD-5, and the November elections to search for documents. Additionally, we do understand Plaintiffs may be in possession of a number of documents responsive to this request by way of open records requests and/or subpoenas served on those counties. In any event, we are producing several documents we believe are responsive to request 2, but at this juncture have not completed our search for documents responsive to request 2(b)(i). State Defendants request this extension through **Friday, August 28, 2020.**

Please let us know if you will consent to the aforementioned extension.
Thanks

<image003.jpg>

Carey A. Miller
Counsel

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